

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF MISSOURI
JEFFERSON CITY DIVISION**

IN RE:)	
Jeffrey D. Reid)	
)	CASE NO. 10-20767-drd
)	
Debtor.)	Chapter 12

**MOTION OF TRUSTEE TO
PAY UNCLAIMED FUNDS TO COURT**

COMES NOW the Chapter 12 trustee herein, Jill Olsen, and for her Motion to Pay Unclaimed Funds to Court, pursuant to 11 U.S.C. §347(a) and Bankruptcy Rule 3011, states as follows:

1. The debtor herein filed a petition for relief under chapter 12 of the United States Bankruptcy Code on April 12, 2010.
2. Jill Olsen is the chapter 12 trustee appointed to administer the bankruptcy estate and continues in that capacity.
3. The Debtor's Chapter 12 plan was confirmed on March 8, 2011. Pursuant to the terms of the confirmed plan, the Debtor was to make an annual payment to the trustee each year on December 31st for distribution to creditors.
4. On January 8, 2015, the case was dismissed on motion of the IRS due to the Debtor's failure to pay post-petition taxes.
5. At the time of the dismissal, the Trustee had on hand \$3,000.00 scheduled to be paid to creditors.
6. On June 4, 2015, the Trustee filed a motion to disburse the funds to the debtor rather than the creditors, pursuant to *Harris v. Viegelahn*, 575 U.S. ____ (May 18, 2015).
7. On June 29, 2015, the Court entered an Order directing the Trustee to disburse the funds to the debtor.
8. On August 14, 2015, the Trustee issued Check No. 1027 for \$3,000.00 to the Debtor, Jeffrey D. Reid, and mailed it to the address on the court's file.
9. This check was never cashed and the Trustee stopped payment after 180 days.

10. The Trustee then attempted to locate a better address for the Debtor but was unable to do so.

11. On December 1, 2015, the Trustee issued Check No. 1028 for \$3,000.00 to the Debtor, Jeffrey D. Reid, and mailed it to the office of Debtor's counsel.

12. The Trustee was subsequently contacted by Debtor's counsel stating that he had no current contact information for the Debtor and that his phone calls had been unanswered. .

13. The Trustee requested the check be returned and stopped payment.

14. Pursuant to 11 U.S.C. §347(a), the trustee has stopped payment on the check and seeks authorization from this Court to pay the funds of \$3,000.00 into the Court to be disposed of under Chapter 129 of Title 28.

15. Pursuant to Rule 3011, the trustee lists all known names and addresses of the entity to be paid the amount referenced above, representing the remaining property of the estate being paid into the Court pursuant to §347(a):

Jeffrey D. Reid
310 W. Grossman St.
Bosworth, MO 64623

Jeffrey D. Reid
621 SW 85th St.
Wakarusa, KS 66546

WHEREFORE, Jill Olsen, trustee prays an Order of this Court authorizing the payment of the unclaimed funds of \$3,000.00 into the Court and for such further relief as the court may deem just.

Respectfully submitted,

By: /s/ Jill Olsen
Jill Olsen MO #49835
The Olsen Law Firm, LLC
118 N. Conistor Ln., Suite B #290
Liberty, MO 64068
Telephone: (816) 521-8811
Facsimile: (816) 278-9493
CHAPTER 12 TRUSTEE

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing was served upon all persons requesting Electronic Case Filing (ECF) notification, to the Office of the United States Trustee, and to all parties listed below on February 8, 2016:

Jeffrey D. Reid
310 W. Grossman St.
Bosworth, MO 64623

Jeffrey D. Reid
621 SW 85th St.
Wakarusa, KS 66546

/s/ Jill Olsen